

Compliance audit 2007
Sept 08
update



Bayer CropScience



BUSINESS CONFIDENTIAL

To Rick Clay
cc Rob Downing, Mike Wey
From Karen Myers
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Memo

9-02-08

Institute Methomyl Larvin Facilitated Self Assessment - 2007

Bayer CropScience
Institute Site
P.O. Box 1005
Institute, WV 25112
USA

I wanted to update the FSA in writing to reflect the present status of the FSA at this time, in view of the request by the Chemical Safety Board and probably OSHA. Many of the "deviciencies" identified in the Nov. 29, 2007 have been abated.

As of September 2, 2008 here are the specific updates referencing the FSA:

Section 1 – Safety File Management Systems

- The safety file has not been kept up-to-date.
Action: As a part of the new control room upgrade project, a safety file room was established and located across from the control room. This room will contain documents referenced in the FSA

Section 2 – Employee Participation

- No Findings – All Minimum Standards met. Many Best Practices in place.

Section 3 – Process Safety Information – Chemicals

- Max inventories for PSM Chemicals need added to the SOP is Section 4 B. Currently it points to the SARA reports
Action: The SOP's are in draft form

Section 4 – Process Safety Information – Technology

- A list of Major accidents and histories to be added to the SOP
Action: The SOP's are in draft form

Section 5 – Process Safety Information – Equipment.

- SOP needs updated with new control systems
- Need to document new equipment is design per standards and codes - per MI
- PSV safety records need generated

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Action: The SOP's are in draft form. A mechanical Integrity Program was issued on 12-31-07. The PSV record generation is in progress within the WCC.

Section 6 – Process Hazard Analysis

- No Findings – All Minimum Standards met. Many Best Practices in place

Section 7 – Standard Operating Procedures

- SOP's are still in draft and needs issued Tom Foxworth signed COP's

Action: The SOP's are in draft form

Section 8 – Training

- No Findings – All Minimum Standards met. Many Best Practices in place.

Section 9 – Contractors

- Contractor evaluation forms are filled out by TA's needs sent to Contract Administrator - contractor evaluations need completed once work is completed

Section 10 – Pre-Startup Safety Review

- No Findings – All Minimum Standards met. Many Best Practices in place.

Section 11 – Mechanical Integrity

- MI procedure in draft needs issued
- Need to look at CBI for vessel program and how to take it into the future
- Control Systems MI records need to have date/inspectors name/ type of test and results recorded - MI system is going to make a STAMP
- MI system need to resolve documentation of action tracking of deficiencies - BATS Work Orders

Action: The MI Program was written and issued 12-31-07. Maintenance Department is managing the vessel inspection program with the help of contractors.

Section 12 – Work Permits

- No Findings – All Minimum Standards met. All Best Practices in place.

Section 13 – Management of Change

- No Findings

Section 14 – Incident Investigations

- Investigation documentation needs to improve – timing of starting the investigation & action tracking
- BATS's issues with not putting action items into the system

Action: The BAT's system has been updated to add investigations items as subtask

Section 15 – Emergency Plans

- Need to get the annual HAWOPER awareness training in CBT for operations

Action: The sites annual HAWOPER is in CBT and completed in early 2008

Section 16 – General or Other Documents

- Not scored - No standards

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Section 17 – Compliance Audits

- No Findings – All Minimum Standards met. All Best Practices in place.

Section 18 – Trade Secrets

- Not scored - No standards

The attached report provides more detail for each section including Best Practices that are in place for the Site and/or the Production Area. If you have any questions, please contact me at Ext. 6728.

Regards,

Karen Myers
Process Safety Coordinator

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